UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

v.

CRIMINAL NO. 22-342 (SCC)

[2] JULIO HERRERA VELUTINI

Defendant.

MOTION TO RESTRICT

TO THE HONORABLE COURT:

COMES NOW the defendant, Julio M. Herrera Velutini ("Mr. Herrera"), by and through his undersigned attorneys, who respectfully states and prays as follows:

- 1. Today, Mr. Herrera will file a motion related to a previously restricted filing (Dkt. 826) and respectfully requests that the Court accept the motion for filing with the following level of restriction: Restricted viewing for case participants only (the Government and the Defendants).
- 2. Mr. Herrera's motion is in response to the Magistrate Judge's Opinion and Order (Dkt. 826) which, in turn, was issued under a restricted viewing. Mr. Herrera is filing the present motion under the same restricted viewing to maintain consistency in the level of protection.

WHEREFORE, the defendant, Julio M. Herrera Velutini, respectfully requests that the motion remain sealed under the requested restriction level.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 7th day of April 2025.

The LS Law Firm

One Biscayne Tower, Suite 2530 2 South Biscayne Blvd. Miami, Florida 33131 Telephone: (305) 503-5503 DLA Piper (Puerto Rico) LLC 500 Calle de la Tanca Ste. 401 San Juan, PR 00901-1969 Tel. 787 281-8100

/s/ Sonia Torres-Pabón

Facsimile: (305) 503-6801 Sonia Torres-Pabón /s/ Lilly Ann Sanchez **USDCPR No 209310** Lilly Ann Sanchez, Esq. Email: Sonia.torres@us.dlapiper.com

Fla. Bar No. 195677

Email: lsanchez@thelsfirm.com

CONTINENTAL, PLLC

By: /s/ Christopher M. Kise Christopher M. Kise (FBN 855545) Admitted Pro Hac Vice

Primary Email: ckise@continentalpllc.com Secondary Email: cforjet@continentalpllc.com

chris@ckise.net

101 North Monroe Street., Suite 750 Tallahassee, FL 32301 Telephone: (850) 332-0702

CERTIFICATION

It is hereby certified that on this date the present motion is filed with the Clerk of the Court through the CM/ECF electronic system restricted to case participants (counsel for defendants and the Government).

> /s/ Sonia I. Torres-Pabón Sonia I. Torres-Pabón